

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MICHAEL MAYO (20181127027),)	
)	
Plaintiff,)	Case No.: 1:21-cv-05014
)	
v.)	Judge John J. Tharp, Jr.
)	
TOM DART,)	
)	
Defendant.)	

**AGREED MOTION FOR ENTRY OF
CONFIDENTIALITY ORDER**

NOW COMES Defendant TOM DART, by and through his attorneys DeVore Radunsky LLC, and in support of this Motion for Entry of Confidentiality Order, states the following:

1. Defendant's counsel conferred with Plaintiff via Zoom Meeting on December 19, 2022, to discuss the entry of a Confidentiality Order related to Defendants' discovery responses, whereby Plaintiff accordingly agreed to this motion.

2. Defendants' discovery responses will include confidential information, as well as potentially personal information of non-party individuals.

3. The proposed Confidentiality Order is based upon the "model" Confidentiality Order on Judge Tharp's page for the Northern District of Illinois.

WHEREFORE, Defendant TOM DART, by and through his attorneys DeVore Radunsky LLC, respectfully requests an order entered as follows:

1. The Motion for Entry of Confidentiality Order is granted,
2. The Confidentiality Order is entered, and
3. Any further relief this Court deems appropriate.

Respectfully Submitted,

By: /s/ Troy S. Radunsky
Attorney for Defendants

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he filed the foregoing document on December 19, 2022, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/ Zachary Stillman
Zachary Stillman